

EXHIBIT

39

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
INC., et al.,

Plaintiffs,

v.

CITY OF MYRTLE BEACH, et al.,

Defendants.

DECLARATION OF LESLIE STEVENSON

I, Leslie Stevenson, hereby state as follows:

1. I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth herein.
2. I am African American. I live in Suwanee, Georgia with my husband, Cedric Stevenson.
3. I recently retired from Allstate Insurance Company, where I worked for twenty-three years.
4. My husband has been riding motorcycles for years, and I often travel with him to bike rallies. I have attended several bike rallies with him, including in Atlanta and Daytona Beach.
5. I travelled with my husband to Myrtle Beach for Black Bike Week in 2016. We had heard great things about the attendees at the rally. While the attendees at Black Bike Week create one of the best atmospheres I've experienced at a festival, our experience with the City's

traffic plan and the police presence in 2016 and again in 2017 have made me hesitant about returning.

6. In 2016, we finished dinner at Landry's Seafood House one evening after 10 p.m. We did not realize that a traffic loop would be in place that would force us on a two-hour drive in order to get back to our hotel at the Sheraton Convention Center. Later that weekend, we left a restaurant prior to receiving our food to ensure we drove home prior to the implementation of the loop in the evening. The rest of the weekend, we worried about getting stuck in the loop again and only went out in the evening to places within walking distance, even though there were other nearby areas we would have liked to explore.

7. We decided to give Black Bike Week in Myrtle Beach a second chance in 2017 because of our positive experience with the other attendees. In fact, we brought my mother, Mary Ann Dunlap with us.

8. When we arrived in Myrtle Beach close to midnight after a long drive, a police officer refused to let us into our hotel, the Holiday Inn Club Vacations at South Beach Resort. He maintained this position even after we showed him proof of our reservation and explained that we could see our hotel just across the intersection. He told us that our only option was to drive the entire 23-mile loop in order to get into our hotel parking lot. Luckily we found a shorter route through back streets in a residential neighborhood, but it still took another 30 minutes after a lengthy drive.

9. Throughout the rest of the weekend, we planned all of our activities in order to avoid the traffic loop. I was particularly worried about getting caught out after 10 p.m. at night, as it would be very difficult for my 70-year-old mother to be stuck in traffic for hours and unable to return to her hotel room late at night. We stayed within walking distance of the hotel in the

evenings to avoid this possibility. This prevented us from exploring other parts of the area and trying restaurants outside of walking distance.

10. During Black Bike Week in both 2016 and 2017, I went on several rides with my husband, riding on the back of his motorcycle. I was shocked to see dozens of police officers along the median. In all of the festivals I have been to, both in the United States and abroad, I have never seen anything like the police presence at Black Bike Week. The police officers were unfriendly, intimidating and made me feel uncomfortable and unwelcome.

11. I would like to return to Myrtle Beach for Black Bike Week, but am unlikely to do so unless the traffic plan is no longer implemented, and the City stops filling the streets with aggressive police officers. I love attending bike festivals and celebrating black bike culture, but the City's actions are preventing me and others like me from expressing ourselves and enjoying our shared culture and values.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED WITHIN THE UNITED STATES ON: February 2nd, 2018

BY: 
Leslie Stevenson